# Home and Community-Based Care Services Program Department of Administration – Program 1

#### I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly, and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

#### A. Accounts Structure.

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. ACoA oversees four grants programs, in four other Division budget components:

- The Home and Community-Based Care (HCB) budget component includes grant funds supporting adult day services, respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include designated grant funds authorized under AS 47.65.
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive services. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Services Employment Program (SCSEP) budget component includes grant funds supporting the senior employment programs. Funding sources include federal Title V, required state general fund match, and state general funds authorized under AS 47.65.

### B. Program Organization

ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer services. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary client contributions. The SCSEP is separate because it is a jobs program, rather than a services program such as NTS, HCB, and SRS--although SCSEP participants often fill staff positions in the services programs. Separate HCB and SRS grant awards also assure that Alaska Mental Health Trust Authority (MHTA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

#### II. PROGRAM PROCEDURES

See Section III, below.

# III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES A. TYPES OF SERVICES ALLOWED OR UNALLOWED

# **Compliance Requirements**

The ACoA-funded HCB services provide more intensive personal care directed to clients at risk of institutionalization. ACoA funds these services with a blend of state general funds and state general funds from the MHTA.

Home and Community Based service programs include the following:

- 1) Adult Day centers provide planned and supervised day-time activities for physically frail or disabled seniors age 60 and over and adults of any age with Alzheimer's Disease and Related Disorders (ADRD). When staffing and space allows, adult day care centers may serve full pay non-ADRD clients under 60 years of age.
- 2) Adult Respite Care programs provide in-home respite care by trained care providers to physically frail seniors 60 and over and adults of any age with ADRD. In addition to ACoA grant awards, the MHTA provides funding (MHTAAR) for innovative respite grants to four respite programs. These monies provide funds for additional hours of care to persons with ADRD, above what the base ACoA funding grant allows. The MHTA funds also permit a 'universal provider' model of service delivery in which one worker

- rather than separate workers may provide services such as respite, chore, and when qualified, personal care services.
- 3) Care Coordination programs (formerly called case management) conduct comprehensive client assessments, service coordination, and ongoing monitoring of service delivery for physically frail or disabled seniors age 60 and over, adults of any age with ADRD, and General Relief clients of any age. Additional state general and mental health monies fund the care coordination program in Fairbanks to provide "brokered" services to ADRD clients under a co-payment discounted system.
- 4) The Alzheimer's Education and Outreach grant is a sole source grant to provide information on Alzheimer's disease and related disorders, community and professional education, and family support services for the families dealing with ADRD statewide.

Funds for HCB grants must be spent only to support the above services. The specific grant identifies the services to be provided and any exceptions must be approved by the ACoA through special grant conditions or Approved Concept Approval Request. Grantees that receive funds for more than one service will receive a separate Notice of Grant Award (NGA) for each type of service.

The following ACoA grants management policies have been in effect since FY 93:

- Grants are awarded based on approved "bottom-line" budgets. Grantees no longer have line item accountability to ACoA within their HCB budgets;
- ACoA may adjust allotments of HCB grants (within the total amount of the grant) based on ACoA's budget control and each grantee's units of service to AMHT-eligible clients. Adjusted allotments will be reflected in revised NGA's to affected grantees.
- Grantees must submit a "Concept Approval Request" form if they wish to change their projects in some way that will cause service levels to increase or decrease more than 5% from the planned service levels shown on their Planned Services form or make any other very major change from what was submitted in the grant application. Examples of "very major changes" include adding or discontinuing a service, opening or closing a site; changing days of service; changing hours of service; serving more or fewer months of the year; shifting large amounts into travel for more than one trip out of state; or a large purchase of equipment.

# Suggested Audit Procedures

- Review specific Request for Proposals under which the grant is funded;
- Review the grant application, Special Conditions of Award on the final Notice of Grant Award, and any approved Concept Approval Requests to

- determine the approved service activities. Occasionally, letters or memoranda in the file may document approved changes in grant activities;
- Determine whether accounting records provide for identification, classification and recording of expenditures and revenues for each allotment on the Notice of Grant Award and for each separate service funded; and
- Verify that expenditures were in accordance with grant terms and conditions and were for allowable costs.

#### B. ELIGIBILITY

# Compliance Requirement

All Home and Community-Based Care programs provide services to physically frail or disabled seniors age 60 and over and adults of any age with Alzheimer's Disease and Related Disorders (ADRD). Within this population, the ACoA expects grantees to concentrate their efforts to serve ethnic minority and low-income seniors.

Order of priority for services is directed to clients:

- Living at home, with or without primary caregivers,
- Living in a supported living environment such as independent senior housing or with relatives;
- Receiving 24-hour care in an adult assisted living home.

Care to clients in a 24-hour formal care facility other than adult assisted living care is not a priority for funding under these grant programs.

Some specific eligibility requirements for specific programs are listed below. Refer to the specific Request for Proposals (RFP), however, for full range of eligibility requirements.

- 1) Adult day centers provide service to clients in need of assistance with Activities of Daily Living (ADL) such as bathing, eating, dressing, toiletry, bed/chair transfer, walking; and Instrumental Activities of Daily Living (IADL) such as housekeeping, meal preparation, shopping, and transportation. In addition, adult day programs may serve non-ADRD clients under 60 if there is room in the program, if they are appropriate to the day care setting, and if they pay full cost of care for the service.
- 2) Adult in-home respite care programs provide relief to caregivers by providing care to physically frail or disabled seniors over 60 years of age and people of any age with ADRD so as to allow caregivers time for themselves. As such, the clients that receive care must have an identified

caregiver, usually someone living in the household. Under special circumstances, care may be provided to a senior who lives alone but who has a designated caregiver nearby.

- 3) Care Coordination serves at risk seniors 60 years of age and over with multiple needs, as well as adults of any age with Alzheimer's disease, and adults on general relief (see RFP for other eligibility criteria.)
- 4) ADRD Statewide Support has no defined clientele but serves as an information, family support and community education program about Alzheimer's disease.

# Suggested Audit Procedures

• Test participant eligibility, if applicable.

# C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

### **Compliance Requirements**

All HCB programs must provide required match as described in the RFP. Local match must be comprised of cash or in-kind items necessary to provide the services of the grant. In-kind match items must be items for which ACoA grant dollars could be used if they were available. In HCB programs, program income and client fees for service may be used to meet match. For a complete discussion of local match, refer to the Cost Proposal Instructions in the RFP under which the grant is funded.

The required local match percentage varies for each community or group of communities from year to year. The amount of local match required is specified on the final Notice of Grant Award.

#### Suggested Audit Procedures

- Review final notice of Grant Award to identify the required level of local match;
- Review grant application and any approved Concept Approval Requests to identify the approved sources of local match; and
- Review the agency's accounting records to determine whether local match has been contributed to the project according to the terms and conditions of the grant.

#### D. REPORTING REQUIREMENTS

Compliance Requirements - Program Reports

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Quarterly Program Reports are due in the Alaska Commission on Aging Juneau office by the 25<sup>th</sup> of the month following the end of the quarter. Provisions for late reports are discussed in the instructions for the report. Reports are to show all of the required information for each service provided or client group served under the grant.

#### Suggested Audit Procedures

- Review the HCB Quarterly Program Report Instructions for the grant year being audited;
- Evaluate the timeliness of report submission;
- Evaluate the completeness of the reports based on approved grant service activities; and
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

#### Compliance Requirements - Fiscal Reports

Cumulative Fiscal Reports are due in the Alaska Commission on Aging Juneau office by the 25<sup>th</sup> of the month following each quarter. If the fourth quarter's report is not marked "Final," a final Cumulative Fiscal Report is due in the ACoA Juneau office by July 30. Provisions for late reports are discussed in the instructions for the report. Reports are to accurately reflect the financial transactions of the grant as specified in the instructions for the report.

# Suggested Audit Procedures

- Review the most recent Cumulative Fiscal Report Instructions for the program;
- Evaluate the timeliness of report submission;
- Evaluate the completeness of the reports based on approved grant service activities; and
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

#### E. SPECIAL TESTS AND PROVISIONS

1) Fees for Service. The Adult Day Centers, Respite Care, and Care Coordination programs must establish fees for services based on the actual cost of service as required by State regulation. Clients may receive discounted rates, based on income, family size, or other variable specified on a sliding fee scale. No client will be turned down because of an inability or unwillingness to pay fees. Fees received from clients do not have to be expended during the quarter in which they were received but requests to carry over these fees into the next fiscal year must be approved by ACoA.

- 2) Program Income. All HCB programs may solicit program income from clients; however, fees for services may usurp program income from clients. Programs must account for program income from clients and spend those funds to enhance or expand the program from which it was derived. Program income is to be spent in the grant year in which it was received. Requests to carryover program income into the next fiscal year must be approved by ACoA. Program income must be expended before ACoA grant funds, unless ACoA has specifically approved other arrangements.
- 3) <u>Program Income Not From Clients.</u> All HCB programs potentially will receive and report interest on bank accounts, rent from the grant portion of the building space, or other sources of program income not from clients.
- 4) Other Sources. Medicaid Waiver receipts used to support the grant should be classified as "Other Sources."
- 5) <u>Criminal Background Checks of In-Home Employees.</u> Each employee of an agency providing publicly funded home care services (homemaker, chore, personal care, home health, and similar services), including volunteer staff and Senior Employment Program participants who provide these services, must have a criminal background check done by the Department of Public Safety, pursuant to AS 12.62.035. Each grantee must adhere to this statute and pursuant regulations.

#### Suggested Audit Procedures

- Check that adult day centers, respite care, and care coordination programs have established a cost for service and are billing clients and collecting fees for services based on a sliding fee schedule;
- Review the grant application (and Notice of Grant Award for possible modifications) to determine the source of program income and whether it was to be solicited from clients;
- Evaluate the solicitation, collection, handling, accounting for, and use of program income;
- Review documentation of receipt and expenditure of Medicaid Waiver revenue to determine whether it is classified as "Other Sources" when dedicated to HCB grant services; and
- Review records to verify that each employee performing home care services has had a criminal background check and has no record of criminal behavior relating to children or senior citizens.

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